



Clean Harbors of Braintree, Inc.  
1 Hill Avenue  
Braintree, Massachusetts 02184-1363 USA

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www.cleanharbors.com

February 25, 2014

Robert G. Heiss  
Director of International Compliance Assurance Division  
Office of Federal Activities  
U. S. Environmental Protection Agency  
Ariel Rios Building, Mail Code: 2254A  
1200 Pennsylvania Avenue NW  
Washington, DC 20460-0002

**SUBJECT: Clean Harbors of Braintree, Inc., MAD053452637  
CY2013 Annual Export Report**

Mr. Heiss:


In accordance with 40 CFR 262.56, regarding Exporting of Hazardous Waste, please find the enclosed Annual Export Report for our facility. These reports summarize the exports of hazardous wastes during Calendar Year 2013 to Canada. Please be advised of the following:

- Our facility did not export any SLABS (spent lead acid batteries) in 2013.
- Our facility only exported to one facility in 2013: Clean Harbors Canada, Inc., Corunna, Ontario.

Please contact me if you have any questions or concerns.

*"I certify under penalty of law that this document and all attachments were prepared under my supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Sincerely,



David P. Cabral, P.E., TURP, BCEE  
Compliance Manager  
cabral.david@cleanharbors.com

cc: Albert Nardone (Massachusetts Department of Environmental Protection)

received  
SAH 3/6/2014

## Instructions

- (1) Please note that this form is being provided for your convenience. It contains all required elements for annual reports under 40 CFR 262.56 and 40 CFR 262.87(a).
- (2) "Exporter Page" - please fill out all items listed on this page, which correspond to 40 CFR 262.56(a)(1)-(2) and (6), and 40 CFR 262.87(a)(1)-(2) and (6).
- (3) If you are required to comply with 40 CFR 262.56(a)(5) and/or 40 CFR 262.87(a)(5), fill out the "Waste Reduction Page".
- (4) "Export Data by Destination" - please fill out all items listed on this page for each waste stream you shipped during the reporting year to each receiving facility, which correspond to 40 CFR 262.56(a)(4) and 40 CFR 262.87(a)(4).
  - (a) The "Receiving Facility" should be the ultimate recycling or disposal facility to which you received consent to export the specific waste streams.
  - (b) The "Applicable OECD Hazardous Waste Codes" are only filled out if you shipped the waste stream to a country listed in 40 CFR 262.58(a)(1) for recovery under 40 CFR Part 262 Subpart H. If you are filling out, please use the applicable waste codes from the appropriate OECD waste list incorporated by reference in 40 CFR 262.89(d). The consolidated green and amber waste lists are on pp.81-98 of the Guidance Manual for the Amended 2001 OECD Decision, available online at <http://www.oecd.org/dataoecd/57/1/42262259.pdf>
  - (c) The "Total Quantity Shipped During Reporting Year" should be the sum of all shipments of that specific waste stream to that specific receiving facility.
  - (d) The "Units for Total Quantity Shipped" should be the units of measurement for the quantity shipped. Please use one of the units listed in the "Acceptable Quantity Units" page.
  - (e) List all transporters used from the initial pick up of the specific waste stream in the US to the final delivery at the specific receiving facility.  
To list more than three transporters, select columns "R" and "S", copy the columns, and then paste to the right as many times as needed.
  - (f) The sheet has been formatted to print out in landscape mode and has been shrunk to fit all columns on one page width. If you need to add more transporter columns, you will need to further shrink the print area to fit the columns to one page width.
  - (g) The set print area includes all current columns and the first 25 data entry rows. If you add columns or have more than 25 unique waste stream-receiving facility combinations, you will need to expand the print area to cover all needed columns and rows.
- (5) Please save the filled out document with a name that includes the exporter name listed on the "Exporter Page". For example, exporter "HazWasteABC" would save the completed document as "Export Annual Report - HazWasteABC - CY2010.xlsx". If different exporters have the same company name, please add the city where the site is located. For example, if "HazWasteABC" has separate exporter sites in Houston, TX and Memphis, TN that had unique consents to export, the Houston site would save the completed document as "Export Annual Report - HazWasteABC Houston - CY2010.xlsx" and the Memphis site would save it as "Export Annual Report - HazWasteABC Memphis - CY2010.xlsx".
- (6) You may print out the "Exporter Page", "Waste Reduction Page" (if required to submit), and "Export Data by Destination" to create a hardcopy report for submittal. Please make sure that all required data is printed out per notes (4)(f) and (4)(g) above. If you choose to submit this print out as your official submittal, please remember to SIGN AND DATE on the printed "Exporter Page". It will not be a complete submittal without your signing and dating the exporter certification statement.
- (7) Please email a copy of the completed document to "[coughlan.laura@epa.gov](mailto:coughlan.laura@epa.gov), [nelson.scott@epa.gov](mailto:nelson.scott@epa.gov), [tatum.jana@epa.gov](mailto:tatum.jana@epa.gov)", and list "Electronic Copy of Annual Report for CY2010" in the subject line of the email.

## **Cabral, David P**

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**From:** Cabral, David P  
**Sent:** Tuesday, February 25, 2014 11:23 AM  
**To:** 'coughlan.laura@epa.gov'; 'nelson.scott@epa.gov'; 'tatum.jana@epa.gov'  
**Subject:** CY2013 - Export Annual Report; Clean Harbors of Braintree, Inc., Braintree, MA  
**Attachments:** Export Annual Report - Clean Harbors of Braintree Inc CY2013.xlsx

Ms. Coughlan, Mr. Nelson, and Ms. Tatum:

Attached to this email is the CY2013 Export Annual Report for the following facility:

**Clean Harbors of Braintree, Inc.**  
**Braintree, MA**  
**MAD053452637**

Thank you.

***Safety Starts with Me: Live It 3-6-5***

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**David P. Cabral, P.E., TURP, BCEE**  
Compliance Manager  
Clean Harbors Environmental Services  
Cell Phone: 513.568.6357  
[cabral.david@cleanharbors.com](mailto:cabral.david@cleanharbors.com)  
[www.cleanharbors.com](http://www.cleanharbors.com)




**Exporter Information**

<b>Exporter Name:</b>	Clean Harbors of Braintree, Inc.
<b>Exporter EPA Identification Number:</b>	MAD053452637
<b>Exporter Mailing Street Address:</b>	1 Hill Avenue
<b>Exporter Mailing City:</b>	Braintree
<b>Exporter Mailing State:</b>	Massachusetts
<b>Exporter Mailing Zip Code:</b>	02184-1363
<b>Exporter Mailing Country:</b>	USA
<b>Exporter Site Street Address:</b>	Same
<b>Exporter Site City:</b>	Same
<b>Exporter Site State:</b>	Same
<b>Exporter Site Zip Code:</b>	Same
<b>Exporter Site Country:</b>	Same

<b>Calendar Year Covered by Report:</b>	<b>CY2013</b>
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**Exporter Certification**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

<b>Exporter Printed Name:</b>	David P. Cabral, P.E., BCEE
<b>Exporter Signature:</b>	
<b>Date of Signature:</b>	2-25-2014

As required in 40 CFR 262.56(a)(5) and 40 CFR 262.87(a)(5), Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41 [biennial report], when submitting in even numbered years:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated:	See Attached
(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:	Information regarding the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years is not available.

**Waste Minimization Plan**  
**and Statement of Management Policy on Toxics Use Reduction**  
**2013**

**Clean Harbors of Braintree, Inc.**  
**1 Hill Avenue**  
**Braintree, Massachusetts 02184-1363**

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Clean Harbors of Braintree, Inc. (CHBI) is a hazardous waste treatment storage and disposal facility (TSDF) licensed under 310 CMR 30.800 of the Massachusetts hazardous waste regulations. Pursuant to section 3005(h) of the Hazardous and Solid Waste Amendments of 1984 (HSWA), CHBI has developed this Waste Minimization Plan.

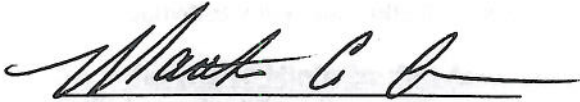
"Waste minimization" is defined by EPA as the reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored or disposed, and includes both source reduction and recycling. Source reduction is defined as the reduction or elimination of waste generation at the source, usually within a process. Recycling refers to 1) the use or reuse of a waste as an effective substitute for a commercial product, or an ingredient or feedstock in an industrial process, and 2) reclamation, which is defined as the recovery or regeneration of a usable product from the processing of hazardous waste.

In its Interim Final Guidance on the Elements of a Waste Minimization Program published in the Federal Register on May 28, 1993 (FR vol. 58, No. 102, Page 31114), EPA outlined six basic elements it believes should be incorporated into a successful waste minimization program.

The six elements EPA has proposed include:

- 1) top management support;
- 2) characterization of waste generation and waste management costs;
- 3) periodic waste minimization assessments;
- 4) appropriate cost allocation;
- 5) encouragement of technology transfer; and
- 6) program implementation and evaluation.

CHBI is dedicated to toxics use reduction wherever economically practicable. CHBI is dedicated to the reduction and elimination of waste wherever economically practicable. CHBI adopts and implements this Waste Minimization Plan which has been developed pursuant to the EPA's interim final guidance.

  
Matthew A. Comeau  
General Manager  
Clean Harbors of Braintree, Inc.

6/20/13  
Date

## **Characterization of Waste Generation and Waste Management Costs**

CHBI has identified the following operational areas of the facility as actual or potential sources of on-site waste generation activity.

### **Laboratory Operations:**

CHBI operates an analytical laboratory used to conduct pre-qualification and conformance testing of candidate waste streams pursuant to the facility's waste analysis plan. The laboratory generates spent solvents, acids, alkalis and other analytical residuals, in addition to accepting generator status of obsolete samples.

### **OnSite Waste Processing Activities:**

CHBI accepts wastes from off-site generators for treatment, storage and consolidation prior to transfer to another properly licensed facility. Actual treatment activities conducted at CHBI include stabilization of inorganic metal bearing wastes (e.g., soil and sludges contaminated with lead).

The quantity of treatment chemicals used to process a particular waste stream (e.g., for stabilization), as well as the specific method used ("recipe") dictate the overall amount of waste which is generated from treatment activities. Candidate waste streams are first subject to a bench scale treatability evaluation to determine the correct treatment "recipe" in order to determine the most practical and cost effective method which will maximize treatment effectiveness while minimizing the amount of treatment residuals generated.

### **Releases:**

The potential for spills, leaks, or other releases exists as a result of waste management activities. Spills or leaks generally require that additional materials (e.g. absorbents) be added to the released material resulting in an increase in the volume of waste generated. CHBI has a comprehensive facility inspection plan as part of its RCRA facility license. Daily, weekly, monthly, and annual inspections of containers, tanks, process lines, containment dikes, safety equipment and operating procedures ensure that potential problems are proactively identified and corrected. Releases are evaluated to determine why the event occurred, and what corrective actions should be implemented to ensure that a similar release will not reoccur.

### **Truck-To-Truck Transfers:**

CHBI has obtained authorization from MassDEP to conduct truck-to-truck transfer of hazardous waste. This authority will result in the reduction of waste which is actually received at the facility. Certain types of waste which have historically been shipped to CHBI only to be reshipped to an ultimate disposal facility, will now be shipped directly to that ultimate disposal facility, and will not be received at CHBI; instead, the containers of waste will be delivered to the facility and transferred among appropriate vehicles without being received and processed (sampled, analyzed). Because CHBI will not take generator status of these wastes, activities such as opening and sampling of containers, analytical conformance testing, and physical transfer of waste through the facility will no longer be conducted. Reduction of these activities will in turn effect a direct reduction of on-site waste generation.

### **Periodic Waste Minimization Assessments:**

CHBI has established the position of Waste Minimization Coordinator. This individual shall be responsible for overseeing waste minimization activities at CHBI. This will include ensuring that waste minimization is incorporated into the training program as appropriate, developing a team of facility personnel and coordinating periodic waste minimization meetings, and ensuring that periodic assessments of the program are conducted. Following each assessment, the plan will be modified if warranted. The waste minimization team will be assembled from various operational areas of the facility, and will be directed by the Facility Compliance Manager or his/her designee.

**Waste Management Cost Accounting System:**

CHBI does not have a formal waste management cost accounting system. CHBI management understands the costs (real and potential) associated with the storage, treatment, disposal and transportation of waste; employee exposure and health care; liability insurance; and potential RCRA corrective action costs. CHBI has a comprehensive training program whereby those individuals responsible for analytical operations, waste treatment activities, and waste handling and storage activities are properly trained in the standard operating procedures required to ensure that waste is managed in a manner that will minimize the generation of additional waste residuals.

**Cost Allocation System:**

Because of the nature of operations at CHBI, a formal cost allocation system is not contemplated at this time. Comprehensive training and inspection plans are currently in place to ensure that releases are minimized. The waste treatment activities (waste stabilization) are continually monitored to ensure that the use of virgin chemicals used in the treatment process are minimized.

If future assessments indicate that one is warranted, then a formal cost allocation system will be developed.

**Encouragement of Technology Transfer:**

CHBI will share any waste minimization successes with other Clean Harbors, Inc. subsidiaries. For example, the Clean Harbors Compliance Department exchanges information on a semiweekly basis via teleconference call. During one such a call, CHBI discussed the success it achieved in reducing spills by implementation of a program of mandatory use of drum straps when moving drummed waste on fork trucks. This tactic has since been established at all CH facilities, and a measurable decrease in releases has been documented.

**Program Implementation and Evaluation:**

This waste minimization plan will be reviewed annually, and amended as necessary.

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Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)
NYD982792814	Freehold Cartage Inc	NJD054126164	CSX Transportation	FLD006921340	GRAFTON AND UPTON RAILROAD COMPANY	MAC300017415

<b>Acceptable Units of Measurement</b>
G = Gallons (liquids only)
K = Kilograms
L = Liters (liquids only)
M = Metric Tons (1000 kilograms)
N = Cubic Meters
P = Pounds
T = Tons (2000 pounds)
Y = Cubic Yards

From: (781) 380-7134  
David Cabral

Origin ID: FMHA



Clean Harbors of Braintree, Inc.  
One Hill Avenue  
Braintree, MA 02184



J14101402070326

SHIP TO: (202) 564-4108

BILL SENDER

**Robert Heiss**  
**Environmental Protection Agency**  
**1200 PENNSYLVANIA AVE NW**  
**MAILCODE: 2254A**  
**WASHINGTON, DC 20460**

Ship Date: 25FEB14  
ActWgt: 1.0 LB  
CAD: 103552227/INET3490

Delivery Address Bar Code



Ref # 61BR-02  
Invoice #  
PO #  
Dept #

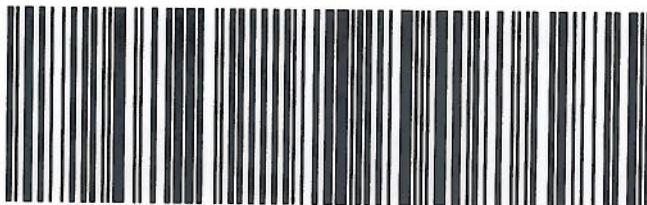
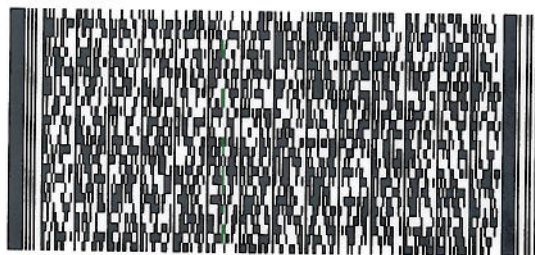
RELEASE#: 3785346

**FRI - 28 FEB AA**  
**EXPRESS SAVER**

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0201

**SA RDVA**

**20460**  
DC-US  
IAD



522G1/562F/F220

**After printing this label:**

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
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12/2/12